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October 5, 2015

Via Hand Delivery

Jean Jewell, Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, Idaho 83702

RECEIVED
2015 OCT -5 PM 4:59
IDAHO PUBLIC
UTILITIES COMMISSION

**RE: CASE NO. GNR-T-15-06
IDAHO TELECOM ALLIANCE, INC. COMMENTS**

Dear Ms. Jewell:

Please find enclosed for filing with the Idaho Public Utilities Commission one original and seven unbound copies of the Idaho Telecom Alliance, Inc.'s Comments in the above-referenced case.

Please feel free to contact me with any questions.

Sincerely,



Kenneth R. McClure

KRM/SLW
Enclosures

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE
APPLICATION OF NEUSTAR, INC., ON
BEHALF OF THE IDAHO
TELECOMMUNICATIONS INDUSTRY,
FOR APPROVAL OF NUMBERING
PLAN AREA RELIEF FOR THE 208
AREA CODE**

CASE NO. GNR-T-15-06

**IDAHO TELECOM ALLIANCE, INC.
COMMENTS**

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COMMENTS OF THE IDAHO TELECOM ALLIANCE, INC.

I. INTRODUCTION

The Idaho Telecom Alliance, Inc. ("ITA") is an Idaho not-for-profit corporation representing fifteen rural Incumbent Local Exchange Carriers¹ providing broadband and basic local exchange services in services territories throughout southern Idaho. ITA member companies provide service in some of the most rural geographic areas in the continental United States. All ITA members are Eligible Telecommunications Companies and Carriers of Last Resort within their certificated service territories. In addition, some ITA members provide Competitive Local Exchange Carrier services in Idaho and other states.

ITA member companies all are Rural Companies as that term is defined in the Telecommunications Act of 1996, 47 U.S. Code § 153(44), but also are the least densely populated and the smallest companies providing telecommunications and broadband services in this State. The largest ITA member company has 6,100 lines. The smallest member company has 81 lines. Five ITA member companies are member-owned cooperatives.² This is by way of saying we have the unique opportunity to know our customers well. They are our neighbors, our

¹ Albion Telephone Company Inc., CTC Telecom, Custer Telephone Cooperative, Direct Communications, Farmers Mutual Telephone Company, Filer Mutual Telephone Company, Fremont Communications, Inland Telephone Company, MTE Communications, Oregon-Idaho Utilities, Project Mutual Telephone Cooperative Association, Inc., Rural Telephone Company, and Silver Star Communications.

² Fremont Communications, Custer Telephone Cooperative, Farmers Mutual Telephone Company, Filer Mutual Telephone Company, and Project Mutual Telephone.

families and members of our communities. We believe we can speak not only on behalf of ITA member companies but on behalf of our customers and communities as well.

Representatives of ITA member companies were involved in the Industry meetings convened by Neustar³ and concur in the consensus recommendations made by Neustar in this Application. ITA recommends and endorses the adoption of Alternative 1, the “all services distributed overlay” as superior to Alternative 2, the “geographic split.”

II. DISCUSSION

Neither Alternative 1 nor Alternative 2 is ideal. Both involve inconvenience and disruption to customers. We acknowledge the need for one or the other, and believe both are superior alternatives to other possible choices not recommended by Neustar. While Alternative 1, the Overlay will cause the need for ten digit dialing, we believe that the disruption caused by Alternative 2, requiring every telephone number in approximately one half of the state to be changed, is a greater disruption to telecommunications and broadband customers in Idaho.

Alternative 1, the Overlay, will cause everyone in the state (equally) to incur the minor inconvenience and annoyance of ten digit dialing. We do not expect anyone to be thrilled with that prospect. To a great extent that inconvenience will be mitigated by the use of “speed dial” and “smart phone” dialing. Pareto’s Principal suggests that 80% of phone calls are made to 20% of the numbers in a person’s phone directory.⁴ The most frequently called numbers are most likely to be contained in a speed dial or smart phone directory of those customers who use one or the other. For these calls, no additional inconvenience will be encountered by the average user once the new area code information has been input into the speed dial or the smart phone directory.

Moreover, the proliferation of numbers which has caused the 208 area code to be exhausted has been driven in no small part by the need for numbers for broadband connectivity and wireless devices. All of the computers and all of the cell phone handsets now in service

³ Exhibit A to Application for Modified Procedure of Neustar, Inc. filed by Neustar, Inc. with the Idaho Public Utilities Commission, July 21, 2015.

⁴ <http://www.bsu.edu/libraries/ahafner/awh-th-math-pareto.html>

contain capacity for dialing that originates from directories. Adapting to ten digit dialing for those calls as well will be a one-time inconvenience.

People who still punch numbers and those who need to connect to numbers not programmed into speed dials or contained in a smart phone directory will have added inconvenience with ten digit dialing. There is no escaping that. They not only will have to remember but also will have to dial the appropriate area code. Still, we believe that to be less disruptive than the alternatives. Some of our companies serve customers in other states in which overlays have been implemented. Very few complaints have been associated with the transition to ten digit dialing in those exchanges. We anticipate similar consumer acceptance in Idaho.

If Alternative 2, the geographic split is chosen, more than half of the state will have very major disruption. The disruption with remembering one new number is manageable. If you are among half of the state unfortunate enough to be moved from the 208 area code to the new one, all of the local numbers you routinely call will be changed. Remembering all new numbers in your local area (where the vast majority of all calls are directed) will be a significant challenge. While it is true that the smart phone and speed dial capabilities that can ease the disruption of Alternative 1 also will ameliorate some of this concern, they will not be as seamless as they will be under Alternative 1. The 20% of calls not contained in a speed dial or a directory will not just have a new area code to remember. They may well have entirely new numbers, something that will be far more difficult to remember.

Perhaps the most disruptive of all is the disruption to business (large and small) that has invested in a phone number that will have to be changed. Most business have good will associated with their phone numbers and have advertising, letterhead, webpages and the like that will have to be changed - - at no small expense. That change will take time for the old number to leave the public domain and be replaced by the new number. Until the old information has been replaced by new (not just by the business but by the person looking for the business' number) and the public has internalized those changes, members of the public will find it challenging to

call the businesses with whom they do business. This is not just a nuisance. It has the potential to cause significant heartburn.

For many Idahoans this is not just a business problem. Many of us have a strange attachment to our "own" telephone numbers, just like we do to our automobile license plate numbers. Admittedly this may be a stronger attachment in rural Idaho than elsewhere - - but that is where we (and our customers) live.

III. CONCLUSION AND RECOMMENDATION

ITA member companies can implement either Alternative 1 or Alternative 2, although we are aware of concerns that Alternative 2 may be more challenging technologically. While it is tempting to say that someone else's area codes should be changed and that we should be "left alone" in our service territories, that isn't responsible. That would simply foist the problem on someone else. In our view, the best choice provides the least disruption for all users of telecommunications and broadband services in Idaho, and that is Alternative 1, the "all services overlay."

Submitted this 5th day of October, 2015.



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